

FILED

FORM TO BE USED BY A PRISONER IN
FILING A CIVIL RIGHTS COMPLAINT

2016 NOV 14 PM 3:12

CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND
FOR THE
NORTHERN DISTRICT OF OHIO

Dontez Demarcus Johnson

(Enter above the full name of the plaintiff in this action)

CIVIL CASE NO. 1:16 CV 2772

VS.

Cuyahoga County Jail

JUDGE JUDGE NUGENT

COMPLAINT

(Enter above the full name of the defendant(s) in this action)

MAG. JUDGE GREENBERG

I. Previous Lawsuits

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? YES ☐ NO ☒

B. If your answer to A is yes, describe the lawsuit in the space below, (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit

Plaintiffs

Dontez Johnson 0232542 James Holder III
0258593 Jeremy Miles 0251347 Deeshawn Campbell 027312

Defendants

Sheriff Clifford Pinkey, Kenneth Mills, Victor McArthur
WARDEN Ivey, food service - chaplain Atkins - Branch

2. Court (if federal court, name the district; if state court, name the county)

Northern District of Ohio - Eastern Division

3. Docket Number

4. Name of judge to whom case was assigned

Shirley Saffold

-2-

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

6. Approximate date of filing lawsuit

7. Approximate date of disposition

II. Place of Present Confinement

Cuyahoga County Jail

A. Is there a prisoner grievance procedure in this institution? YES ☒ NO ☐

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?
YES ☒ NO ☐

C. If your answer is YES,

1. What steps did you take? wrote several inmates Requests to the Sheriff Department.

2. What was the result? NO Response at all.

D. If your answer is NO, explain why not

E. If there is no prison grievance procedure in the institution, did you complain to prison authorities?

YES ☐ NO ☐

F. If your answer is YES,

1. What steps did you take?

2. What was the result?

- 3 -

III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any).

A. Name of the Plaintiff Donte2 Demarcus Johnson
 Address P.O. Box 5600 Clev. Ohio 44101

(In item B below, place the full name of the defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Use item C for the names, positions and places of employment of any additional defendants).

B. Defendant Sheriff Clifford Pinky Kenneth Mills is employed as
Victor McArthur Warden Victor McArthur Warden Victor McArthur Warden
Cuyahoga County Jail at Director of regional correction A/W Warden

C. Additional Defendants Food Service - Chaplain - Mail room

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separated paragraph. Use as much space as you need. (Attach extra sheet(s) if necessary).

1) Inmates on A/D status in special housing unit are not allowed to purchase commissary at all.

2) Inmates are not permitted to talk while in special housing unit.

3) Inmates are not allowed to use the Telephone unless it's a attorney.

4) Inmates are served (1) Bologna sandwich, a handcut of carrots. Once piece a fruit, and one half pint Milk for lunch and dinner every day.

- 4 -

While housed in ^(Statement of Claim Continued) special housing unit.

5) Inmates are not allowed to send out certified Mail.

6) Somebody who responsible for the inmate Handbook. Are falsifying state documents. Because inmates have never came out of there cell at 7:00 a.m. since we been here. or inmates dont lock-up at 10:00 p.m. on every night Even when theres NO razor night.

7) And There falsifying state documents by sayin on the Hot Food list that says "B- Meaning Bottom" F Meaning T- Meaning Top There are no bunk-beds in jail. 2 inmates are literally sleeping on the floor.

8) Inmates have nowhere to place there clothes if they decide to jump in the showers. Inmates usally place there Clean clothes or either a Dirty Garbage can or either a push broom or a push Mop.

9) And They sale inmates food ~~inmates~~ Items such as 'Ramen' noodle soups. But do not sale bowls. Leavin inmates so many choices as to how to eat there Food. Rice soups etc. Out either a Chip-Bag

- 5 -

V. Relief

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes).

Well i would like to be compensated for this
 cruel & Unusually act. And for Emotion & Mentally
 Distress. And The Sheriff and The Warden helded
 accountable for them falsifying state documents.
 And stripping away inmates rights. As the U.S.
 constitution says. And to fix all what there
 doing wrong. I also want them to lift all these
 false separations. I also want them to Honor my Medical
 Know Allegies. ~~by county, county~~ CUYAHOGA COUNTY Medical
 I also want them to quit torturing inmates by making
 Them sleep on the floor. And to be moved to some
 where i can access to the courts. The Law Library.
 Signed this November day of 5 2016.

I declare under penalty of perjury that the foregoing is true and correct.

11-5-16

(Date)

Donty Johnson

(Signature of Plaintiff)

5

coffee-pag. rice-pag forcing inmates to save there bags because we do not have no bowls at all.

10) Plus we are not allowed Microwave or 180 degrees water to cook there food.

11) The Sheriff and other Departments will not answer none of my complaints. Regarding any of these issues.

12) Red Zone is not in the 2016 Inmate Handbook Revised January 2016. Means inmates are lock-up in there cell for countless hours due to understaffed at Cuyahoga county jail.

13) There are no showers curtains in the showers to block the water from slashing or spraying on the outside floor. So because of this water makes a continuous puddle. Mixed with human waste and germs. This continuous puddle of water consistently floods the outside the shower and nearby inmates cells leaving them in great risk of obtaining lice parasites and MRSA (staph) or slipping.

14) Inmates are being denied their 1st Amendment of the U.S. Constitution right to Freedom of Religion and religious services because of Red Zone. Which is not in the Inmate Handbook 2016 January Revised 2016.

(6)

15) The WARDEN is also denying inmates, there access to the courts by denying inmates access to the Law Library.

16) And There also tryin to Keep forcing food, on me that im allergic to. See Medical files. And the rule book clearly says. All inmates with food Allergies will be provided a Standard Allergy free diet. But still to this day serve me beans.

17) inmates are not allowed to receive mail in special housing unit including Legal Mail.

18) inmates do not have access to the courts which included no law library at all. See response they verbally told me there's no law library. That's the reason why they said they already responded to it.

19) They falsly~~ly~~ put seperations on me which costed me not to work. Which LaDon Moore and Dwight Humphries. Well i went to solitary confinement. And was released because the SRT. Told me i was in solitary confinement for a fight. which i beat. And still keep the seperations. Which i got acquitted but keep the seperation.